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DEPARTMENT OF TRANSPORTATION
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BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

In the Matter of
Expanding International
Air Service Opportunities
to More U.S. Cities

Docket No. 46534

COMMENTS OF BANGOR INTERNATIONAL AIRPORT

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Dated: November 13, 1989

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In Order 89-10-19, DOT outlined and requested comments on a proposal to expand service opportunities to U.S. communities by awarding extra-bilateral authority to foreign carriers meeting certain criteria. Bangor International Airport ("Bangor") welcomes the Department's recognition that "international air service can mean expanded tourism, business, foreign investment, and jobs -- in short, a boon to economic development." Order 89-10-19 at 1. Bangor fully supports the Department's efforts to obtain this boon for local economies by expanding opportunities to foreign carriers. As discussed below, however, Bangor asks that the Department's final policy state clearly that it will allow technical stops in addition to the traffic stops to be authorized.

Bangor and the community it serves are well-positioned to benefit from the expanded international air service

contemplated in the proposed policy. Bangor employs many skilled mechanics and other workers as a consequence of its ideal location as a technical stop between the United States and Northern Europe, and is hopeful that the Department's new policy will increase these valuable employment opportunities. Bangor also would qualify to receive direct international services to many new cities, with concomitant benefits to the airport and the community.

Bangor's only request for modification of the proposal is for the Department to clarify that it does not preclude technical stops at Bangor or similar U.S. airports in connection with the nonstop or one-stop service the proposal contemplates. Many new-entrant or carriers from developing countries use aircraft which lack the range, absent a refueling stop at Bangor or a similarly-situated city, to reach the U.S. cities newly available to them under the Department's proposed policy. Allowing additional technical stops will help make the policy's benefits available to these carriers on an equal basis.

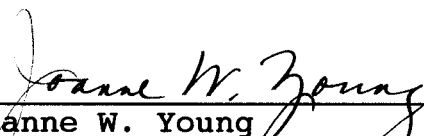
It would serve no regulatory or foreign policy purpose to deny the policy's benefits to carriers that, due solely to their limited financial and thus equipment resources, must make a technical refueling stop. Technical stops at a U.S. airport such as Bangor benefit the local economy by providing employment to mechanics and other airport workers. Moreover, the lower fares offered by many of these new-entrant carriers stimulate new

passenger traffic, significantly enhancing the economic benefits to be achieved by U.S. cities under the Department's new policy.

Enabling U.S. communities to exploit fully the potential benefits of international air service is an important end that cannot be reached by a single means. The Department's proposal is a significant first step toward providing U.S. communities with the international air service they need and deserve, and Bangor welcomes it as such. Bangor would also welcome further such steps in the near future.

Accordingly, Bangor supports the Department's proposed policy as an important first step in expanding service opportunities to U.S. communities, but urges that the policy be clarified to ensure that technical stops for refueling and other aircraft support functions are permitted notwithstanding the proposed limitation of the new policy to "nonstop" or "one stop" services.

Respectfully submitted,


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